

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS - FORT WORTH DIVISION**

**JOSEPH FRIEDHEIM,**  
**IASMIN FRIEDHEIM, and**  
**J.F. SOLUTIONS LTD.,**  
*Plaintiffs/Counter-Defendants*

v.

**THOMAS HOEBER, and**  
*Defendant/Counter-Plaintiffs*  
**HÖEBER MEDIA, LLC,**  
*Defendant/Intervenor*

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**Civil Action No. 4:20-cv-335**

**NOTICE OF PARTIAL WITHDRAWAL OF MOTION  
TO PERMIT WITNESSES TO APPEAR VIA VIDEO CONFERENCE**

TO THE HONORABLE JUDGE OF THIS COURT:

PLEASE TAKE NOTICE THAT Plaintiffs hereby *partially* withdraw their pending Motion to Allow Witnesses to Appear Via Video Conference (ECF No. 63) to the extent that such motion applied to Marina Duarte Brás (“Bras”), Luis Alfanzo Fidalgo (“Fidalgo”), and Francisco Miguel Farhinha (“Farhinha”).

The Court’s Order on Plaintiff’s Motion for Leave to Amend resolves Plaintiffs’ Motion with respect to Bras, Fidalgo and Farhinha because testimony of those witnesses we related to claims asserted in the proposed Plaintiff’s Third Amended Complaint, which the Court has determined will not be allowed.

Plaintiffs would ask that the Court still consider their Motion with respect to Nuno Tuna and Kini Cassamo. Additionally, Plaintiffs respectfully ask that the Court rule on Plaintiffs’ motion expediently so that Plaintiffs’ witnesses will have as much time as possible to make international travel plans once a new trial date is set, if required.

Respectfully Submitted,

Norred Law, PLLC

/s/ Warren V. Norred

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Attorney for Defendant and Intervenor

**CERTIFICATE OF SERVICE** - I certify that this document was served on all parties seeking service in the instant case via the Court's e-file system on September 29, 2021.

/s/ Warren V. Norred

Warren V. Norred